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February 3, 2006

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Certification of CPNI Filing February 3, 2006)
Docket No. EB-06-TC-060
EB Docket No. 06-36

Dear Ms. Dortch:

In compliance with the FCC's Public Notice, DA 06-223 (released on January 30, 2006), Iowa Wireless Services, LLC d/b/a **i wireless** hereby files its report providing its annual CPNI officer certification and accompanying statement explaining how its operating procedures ensure compliance with the FCC's CPNI rules.

Should you have any questions or need additional information, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steven T. Schuler".

Steven T. Schuler
Chief Financial Officer

cc: Mr. Byron McCoy (FCC)
Best Copy and Printing, Inc.



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ANNUAL CERTIFICATE OF COMPLIANCE
WITH CPNI REGULATIONS

I, Steven T. Schuler, an officer of Iowa Wireless Services, LLC d/b/a **i wireless**, do hereby certify for the year 2006, based upon my personal knowledge that **i wireless** has established operating procedures that are adequate to ensure compliance with the rules in 47 C.F.R. §§ 64.2001-64.2009. The statement accompanying this certificate explains how the Company's operating procedures ensure that it is in compliance with those rules.

A handwritten signature in blue ink, appearing to read "Steven T. Schuler", written over a horizontal line.

Steven T. Schuler
Chief Financial Officer

Statement of Customer Proprietary Network Information (CPNI)
For Iowa Wireless Services, LLC d/b/a **i wireless**

FCC Rules are shown in italics, **i wireless** statement of compliance is shown below each rule

§64.2009 Safeguards required for use of customer proprietary network information. CPNI)

(a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

i wireless does not sell or release CPNI to third parties for marketing purposes. CPNI of call detail is released to Law enforcement agencies only when presented with a subpoena. Information is released to 911 personnel only after verifying the call is from a 911 dispatcher. This is done through caller ID or a call to the dispatch center.

A customer's individual CPNI is released only to the account holder, upon verification of identity. Account Verification includes, account owner's full name, Social Security number (last 4 digits), complete address, and home phone number.

(b) Telecommunications carriers must train their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.

In its employee policy manual **i wireless** clearly states that removing, revealing or otherwise misusing confidential information is a violation of company policy that could result in disciplinary measures including termination. The disciplinary policy in place is: First, a verbal warning and counseling with the employee's supervisor. For the second offense of the same violation, a written warning is given. The employee must sign and date the notice. Upon the third offense of the same violation, the employee may be subject to probation or suspension. For the fourth offense of the same violation, the employee will be subject to dismissal. The employee policy manual also states that the company reserves the right to terminate an employee at any time whether or not the above steps have been followed.

Access to CPNI is limited to employees whose duties require such access. **i wireless** provides training to its employees regarding confidentiality of CPNI. As a part of the new hire training, employees who have access to CPNI are informed of the verification procedures. The company also performs quality assurance monitoring to ensure verification procedures are followed.

(c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties or where third parties were

allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

i wireless does not provide CPNI to third parties for marketing purposes. **i wireless** maintains the required records of its marketing campaigns soliciting current or previous customers for services or products. **i wireless** maintains records of customers that have asked not to receive solicitations and does not contact those customers in marketing campaigns.

(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for out-bound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed out-bound marketing request for customer approval.

i wireless has a supervisory review process in place that requires all marketing and sales campaigns to be approved by a supervisor.

(e) A telecommunications carrier must have an officer, as an agent of the carrier, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart.

This statement and the accompanying certification fulfill the requirements of the above rules.